

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 4 CASES LISTED IN
EXHIBIT A OF PLAINTIFFS' NOTICE OF
ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
GREGORY T. BALES, M.D. FOR WAVE 4**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion filed against Gregory T. Bales, M.D. for Ethicon Wave 1, Dkt. 2054 (motion), 2057 (memorandum in support). Plaintiffs respectfully request that the Court exclude Gregory T. Bales' testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Wave 4 cases identified in Exhibit A attached hereto.

Dated: April 12, 2017

Respectfully submitted,

/s/ Edward A. Wallace
Edward A. Wallace
Wexler Wallace LLP
55 W Monroe Street, Suite 3300
Chicago, Illinois 60603
T. (312) 346-2222
F. (312) 346-0022
E. eaw@wexlerwallace.com

Bryan F. Aylstock, Esq.
Renee Baggett, Esq.
Aylstock, Witkin, Kreis and Overholtz, PLC
17 East Main Street, Suite 200
Pensacola, Florida 32563
T. (850) 202-1010
F. (850) 916-7449
E. rbaggett@awkolaw.com

Thomas P. Cartmell
Wagstaff & Cartmell LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
T. 816-701-1102
F. 816-531-2372
E. tcartmell@wcllp.com

Exhibit A

Plaintiff Name	Case No.
Christopherson, Verla	2:12-cv-04365
Horton, Barbara	2:12-cv-03641
Humbert, Anne	2:12-cv-04170
Kramer, Catherine	2:12-cv-03696
Lunsford, Sharon Kay	2:12-cv-03308
Thate, Connie	2:12-cv-04144
Wade, Mary	2:12-cv-04512

CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2017, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Edward A. Wallace

Edward A. Wallace

Wexler Wallace LLP

55 W Monroe Street, Suite 3300

Chicago, Illinois 60603

T. (312) 346-2222

F. (312) 346-0022

E. eaw@wexlerwallace.com